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## **REMARKS**

### **Information Disclosure Statements**

The Office Action states: "The listing of references in the Search Report is not considered to be an information disclosure statement (IDS) complying with 37 CFR 1.98. ... Therefore, the references cited in the Search Report have not been considered."

However, the Search Report cited only a single reference, GB 2 372 303. That reference was separately listed on PTO Form 1449, a copy of the reference was provided, and the Examiner initialed the citation of the reference on Form 1449 indicating that the reference was considered. Clarification is requested.

A Supplemental I.D.S. was filed on December 9, 2005.

Applicant requests that the references cited in the Supplemental I.D.S. and listed on PTO Form 1449 be considered and made of record in this case.

### **Drawings**

The Office Action objected to the drawing figures as not showing the subject matter of claims 5 and 8.

Claims 5 and 8 have been canceled.

### **Rejection under §112**

The Office Action rejected claim 7 under §112 stating: "It is unclear how the driven gear can turn less than the cam actuator when the cam actuator is attached to a gear with the same diameter as that of the driven gear."

In the illustrated embodiment, cam actuator 16 is attached to driver gear 22 which engages idler gear 24 which is also engaged with driven gear 26. One skilled in the art would appreciate that the mechanical advantage of cam actuator 16 may be varied by selecting the diameters of gears 22, 24 and 26. Certain such selections (such as those wherein driver gear 22 has a smaller diameter than driven gear 26 would result in "a

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driven gear that makes less than one complete revolution for each complete revolution of the cam actuator" as required by claim 7.

Rejections under §102

The Office Action rejected claims 1 – 4, and 8 – 10 under §102(b) as being anticipated by U.S. Patent No. 6,471,250 to Smith.

Claim 1 has been amended to recite that the drive mechanism comprises a gear train. The junction plate assembly disclosed in Smith does not have a gear train.

The Office Action rejected claims 1 and 6 under §102(e) as being anticipated by U.S. Patent No. 6,805,382 to Jennings. The Office Action contends that, in regard to claim 6, the drive mechanism comprises a gear train.

There is no gear train in the flowline connector described in Jennings. The word "gear" does not appear anywhere in Jennings. The drawing figures of Jennings do not show any gear or gear train. Rather, the mechanism of Jennings employs jack screws to raise and lower connector receptacle 28. [col. 3; lines 53-59]

Jack screws 22 extend from an upper end of frame 12 and are rotatably secured in landing bases 16. The upper ends of jack screws 22 extend through jack nuts 24 rigidly attached to the upper surface of frame 12. In the preferred embodiment, each arm 14 has one of the landing bases 16 and one of the jack screws 22. Each jack screw 22 secures to landing base 16 and extends upward through an upper end of arm 14 through jack nut 24 attached to an upper surface of arm 14 as shown in FIG. 2. Jack screws 22 have polygonal upper ends. [col. 2; lines 56-65]

In another embodiment described in Jennings, hydraulic actuators replace the jack screws.

In the alternative embodiment of FIG. 8, jack screws 22 are replaced by hydraulic actuators 26. Hydraulic actuators 26 are positioned such that when connector 10 is in the fully engaged position, the piston rods of actuators 26 are not exposed to sea water. Where hydraulic actuators 26 are used instead of jack screws 22, tool

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42 is equipped with hydraulic connectors (not shown) that supply hydraulic pressure to each actuator. [col. 4; lines 39-46]

Lacking a gear train, Jennings cannot anticipate claim 6 or claim 1 (as amended).

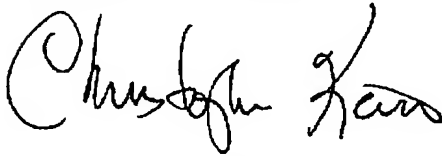
Rejection under §103

The Office Action rejected claim 5 as being unpatentable over Smith in view of Regal.

Claim 5 has been canceled.

For the reasons stated above, it is submitted that claims 1 – 4, 7 and 9 – 18 are now in condition for allowance. Reconsideration of the rejection is requested.

Respectfully submitted:



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